

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date filed: 9-12-2008

Name of company covered by this certification: Kelley's Tele-Communications Inc.

Form 499 Filer ID: 811128

Name of signatory: Jerry Sovereign

Title of signatory: President

I, Jerry Sovereign, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. See attached documents.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

If affirmative:

Signed    Jerry Sovereign

September 12, 2008

Kelley's Tele-Communications, Inc

Form FCC Filer Id: 811128

Compliance Information for CPNI rules:

Kelley's Tele-Communications, Inc apologizes for the tardy response to EB Docket 06-36. We have been doing business with the FCC for over 30 years and this is our first instance of missing a deadline. To our knowledge we did not receive any notification of EB Docket 06-36.

Kelley's Tele-Communications, Inc is a small local paging company. Kelley's does not take applications or allow access to our customers' or their information via the internet. All paper copies of CPNI information is kept in-house in a locked room. Billing information only is kept in our computerized database with firewalls protecting the customer's billing information. All inquiries on customer accounts are queried before sharing information with callers (account numbers, address', contact persons).

Kelley's does not share our customer database with any outside company.

Kelley's requires all employees sign and adhere to our "Secrecy of Communications Pledge" to protect consumer privacy.

Jerry Sovereign

SECRECY COMMUNICATIONS PLEDGE  
Read carefully before signing

Every communications of any type which is transmitted through the facilities of Kelley's Tele-Communications, Inc. is the personal property of the customer. The substance, content, or nature of any telephone conversation or other communication which I handle is not to be divulged. Secrecy of communications is a fundamental policy of the company and is protected by Federal and State Laws which impose severe penalties upon any person who violates this secrecy.

I understand the "Secrecy of Communications" pledge and will abide by it.

Signature of Applicant: \_\_\_\_\_

Date: \_\_\_\_\_

Signature of Witness: \_\_\_\_\_

Date: \_\_\_\_\_